

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SERGEY LEONTIEV, :  
Plaintiff, :  
-against- : No. 16-cv-03595 (JSR)  
ALEXANDER VARSHAVSKY, : **ORAL ARGUMENT REQUESTED**  
Defendant. :  
:-----x

**DECLARATION OF MARSHALL R. KING IN FURTHER SUPPORT OF PLAINTIFF'S  
MOTION FOR SUMMARY JUDGMENT**

I, MARSHALL R. KING, declare under penalty of perjury as follows:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, and am counsel of record for Plaintiff Sergey Leontiev. As such, I am fully familiar with the facts set forth in this Declaration.

2. I respectfully submit this Declaration in further support of Plaintiff's motion for summary judgment as to Plaintiff's first cause of action.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the deposition of Alexander Varshavsky, dated January 5, 2017.

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the deposition of Alexander Shcheglyaev, dated January 11, 2017.

5. Attached hereto as Exhibit 3 are true and correct copies of a document produced by Sergey Leontiev bearing Bates numbers SL00018142, consisting of a September 7, 2015 email from Fedor Brazhnikov to Alexia Andreou, Elizabeth Kitallides, and Michael Marina, with the subject, "Forms."

6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the deposition of Irina Zubiy, dated January 9, 2017.

7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the deposition of Irina Monakhova, dated January 17, 2017.

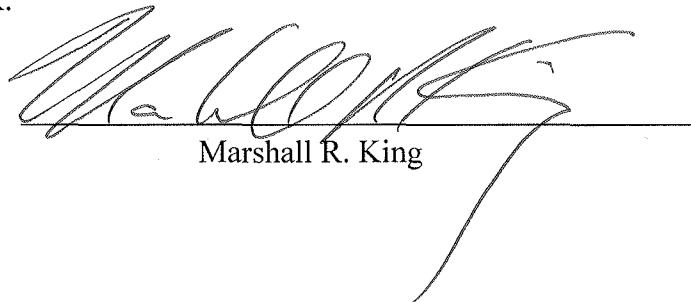
8. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the deposition of Vitaliy Popov, dated January 9, 2017.

9. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the deposition of Yulia Semenova, dated December 19, 2016.

10. Attached hereto as Exhibit 8 is a true and correct copy of a document produced by Sergey Leontiev bearing Bates numbers SL0002851 – SL0002853, consisting of an informal translation of a December 1, 2015 order declining to institute charges by the Investigative Committee of the Russian Federation.

11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the deposition of Vadim Kolotnikov, dated January 12, 2017.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 17, 2017 in New York, New York.



Marshall R. King